

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth.**

**ORDER GRANTING FIVE HUNDRED FIFTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO  
UNLIQUIDATED CLAIMS**

Upon the *Five Hundred Fifty-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unliquidated Claims* (the “Five Hundred Fifty-Fourth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth” or the “Objecting Debtor”), dated December 16, 2022, for entry of an order liquidating certain claims filed against the Commonwealth, as more fully set forth in the Five Hundred Fifty-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Fifty-Fourth Omnibus Objection.

Fifty-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Fifty-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in Exhibit A to the Five Hundred Fifty-Fourth Omnibus Objection (the “Unliquidated Claims”) should be liquidated and allowed; and the Court having determined that the relief sought in the Five Hundred Fifty-Fourth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Fifty-Fourth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Fifty-Fourth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Unliquidated Claims are liquidated and allowed in the amounts identified in the columns titled “Modified and/or Allowed” in Exhibit A to the Five Hundred Fifty-Fourth Omnibus Objection; and it is further

ORDERED that Kroll, is authorized and directed to designate the Unliquidated Claims as liquidated on the official claims registry in the Title III cases; and it is further

ORDERED that this Order resolves Docket Entry No. 23096 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Fifty-Fourth Omnibus Objection**

## Five Hundred Fifty-Fourth Omnibus Objection

## Exhibit A - Claims to Be Liquidated and Allowed

ASSERTEDMODIFIED AND/OR ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	CE & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960	12404	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Commonwealth of Puerto Rico	Unsecured	\$72.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$72.00 for the Claim, such amount fully liquidates the Claim.								
2	CEMEX CONCRETOS, INC. (AND/OR CEMEX DE PUERTO RICO, INC.) SUCCESSOR IN INTEREST OF READY MIX CONCRETE, INC. GONZALEZ & ROIG PO BOX 193077 SAN JUAN, PR 00919-3077	78288	Commonwealth of Puerto Rico	Unsecured	\$45,175.30*	Commonwealth of Puerto Rico	Unsecured	\$45,175.30
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$45,175.30 for the Claim, such amount fully liquidates the Claim.								
3	COLON QUIÑONES, CHRISTOPHER DONALD MILÁN GUINDÍN PO BOX 1565 LAJAS, PR 00667	6605	Commonwealth of Puerto Rico	Unsecured	\$35,000.00*	Commonwealth of Puerto Rico	Unsecured	\$35,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$35,000.00 for the Claim, such amount fully liquidates the Claim.								

## Five Hundred Fifty-Fourth Omnibus Objection

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	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
4	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	21731	Commonwealth of Puerto Rico	Unsecured	\$12,209.10*	Commonwealth of Puerto Rico	Unsecured	\$12,209.10
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$12,209.10 for the Claim, such amount fully liquidates the Claim.								
5	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	23193	Commonwealth of Puerto Rico	Unsecured	\$500.00*	Commonwealth of Puerto Rico	Unsecured	\$500.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$500.00 for the Claim, such amount fully liquidates the Claim.								
6	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	24253	Commonwealth of Puerto Rico	Unsecured	\$11,100.00*	Commonwealth of Puerto Rico	Unsecured	\$11,100.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$11,100.00 for the Claim, such amount fully liquidates the Claim.								

## Five Hundred Fifty-Fourth Omnibus Objection

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	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
7	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	24857	Commonwealth of Puerto Rico	Unsecured	\$10,000.00*	Commonwealth of Puerto Rico	Unsecured	\$10,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$10,000.00 for the Claim, such amount fully liquidates the Claim.								
8	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD, SUITE 420 LAKE WORTH, FL 33467	25007	Commonwealth of Puerto Rico	Unsecured	\$15,000.00*	Commonwealth of Puerto Rico	Unsecured	\$15,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$15,000.00 for the Claim, such amount fully liquidates the Claim.								
9	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	25073	Commonwealth of Puerto Rico	Unsecured	\$17,850.00*	Commonwealth of Puerto Rico	Unsecured	\$17,850.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$17,850.00 for the Claim, such amount fully liquidates the Claim.								

## Five Hundred Fifty-Fourth Omnibus Objection

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ASSERTEDMODIFIED AND/OR ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
10	ELEVEN ELEVEN CORP. VERÓNICA MALAVÉ PO BOX 305 CATAÑO, PR 00963-0305	9444	Commonwealth of Puerto Rico	Unsecured	\$7,504.20*	Commonwealth of Puerto Rico	Unsecured	\$7,504.20
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$7,504.20 for the Claim, such amount fully liquidates the Claim.								
11	GARCIA TORRES, AWILDA MARTIN GONZÁLEZ VÁZQUEZ PO BOX 591 MERCEDITA, PR 00715-0591	46893	Commonwealth of Puerto Rico	Unsecured	\$50,000.00*	Commonwealth of Puerto Rico	Unsecured	\$50,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$50,000.00 for the Claim, such amount fully liquidates the Claim.								
12	JARIDA GARCIA MELENDEZ AND FERNANDO BALMORI ALOMAR IN REPRESENTATION OF THE MINOR V.B.G. HARRY ANDUZE MONTAÑO, ESQ. 144 AVE. FERNÁNDEZ JUNCOS SAN JUAN, PR 00909	24610	Commonwealth of Puerto Rico	Unsecured	\$6,000.00*	Commonwealth of Puerto Rico	Unsecured	\$6,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$6,000.00 for the Claim, such amount fully liquidates the Claim.								

## Five Hundred Fifty-Fourth Omnibus Objection

## Exhibit A - Claims to Be Liquidated and Allowed

ASSERTEDMODIFIED AND/OR ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
13	KERCADO FUENTES, BELEN 300 AVE. BOX. 313 COND. ESTANCIAS DE METROPOLIS CAROLINA, PR 00987	29606	Commonwealth of Puerto Rico	Unsecured	\$20,000.00*	Commonwealth of Puerto Rico	Unsecured	\$20,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$20,000.00 for the Claim, such amount fully liquidates the Claim.								
14	M.R.C.C. MINOR REPRESENTED BY MOTHER EILEEN CORREA ATTORNEY ANTONIO BONZA TORRA 602 A.M. RIVERA, 6NMS BLDG OF 406 HATO REY, PR 00918	31888	Commonwealth of Puerto Rico	Unsecured	\$10,000.00*	Commonwealth of Puerto Rico	Unsecured	\$10,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$10,000.00 for the Claim, such amount fully liquidates the Claim.								
15	NATIONAL INSURANCE COMPANY EN LIQUIDACIN PO BOX 270043 SAN JUAN, PR 00928	363	Commonwealth of Puerto Rico	Unsecured	\$11,053.36*	Commonwealth of Puerto Rico	Unsecured	\$11,053.36
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$11,053.36 for the Claim, such amount fully liquidates the Claim.								

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	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
16	OSORIO IGLESIAS, EFRAÍN LCDA. YESES NIA VARELA COLÓN CALLE ESCORIAL 382 URB. CAPARRA HEIGHTS SAN JUAN, PR 00920	8624	Commonwealth of Puerto Rico	Unsecured	\$25,000.00*	Commonwealth of Puerto Rico	Unsecured	\$25,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$25,000.00 for the Claim, such amount fully liquidates the Claim.								
17	QBE SEGUROS LCDO. FRANCISCO SAN MIGUEL-FUXENCH PO BOX 190406 SAN JUAN, PR 00919	58855	Commonwealth of Puerto Rico	Unsecured	\$15,000.00*	Commonwealth of Puerto Rico	Unsecured	\$15,000.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$15,000.00 for the Claim, such amount fully liquidates the Claim.								
18	SUNC. LUIS D. FERNANDEZ GLADYS TORRES SILVA LCDA. ALICE HERNANDEZ AGOSTO PMB 333 BOX 607071 BAYAMON, PR 00960-7071	147555	Commonwealth of Puerto Rico	Unsecured	\$10,091.00*	Commonwealth of Puerto Rico	Unsecured	\$10,091.00
Reason: The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the Claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$10,091.00 for the Claim, such amount fully liquidates the Claim.								